IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Plaintiff,

v.

Case No. 3:21-cv-04108-MGL

ALAN WILSON, in his official capacity as Attorney General of South Carolina; and MARK KEEL, in this official capacity as Chief of the South Carolina State Law Enforcement Division,

Defendants.

Motion to File Documents Under Seal Pursuant to Local Rule 5.03

Plaintiff John Doe moves for permission to file documents in support of his Motion for Summary Judgment [ECF 6] under seal. Pursuant to Local Rule 5.03, unredacted copies of these documents will be provided to the Court for *in camera* review.

Doe has no objection to Defendants obtaining and reviewing the sealed documents subject to the Court granting his Motion for Protective Order [ECF 5].

Plaintiff has not conferred with opposing counsel regarding this motion because this action was filed today, and Defendants have not yet been served.

Counsel hereby certifies that this motion is accompanied by a non-confidential, descriptive index of the documents at issue, **Exhibit 1**, and is supported by a memorandum of law discussing the relevant legal factors.

Dated: December 22, 2020

[SIGNATURE BLOCK ON FOLLOWING PAGE]

Respectfully submitted,

/s/ Allen Chaney

Allen Chaney (Fed. Bar #13181) American Civil Liberties Union Foundation of South Carolina P.O. Box 20998 Charleston, South Carolina 29413-0998

Telephone: (843) 282-7953 Facsimile: (843) 720-1428 Email: achaney@aclusc.org

Matthew Strugar*
Law Office of Matthew Strugar
3435 Wilshire Blvd., Suite 2910
Los Angeles, CA 90010
Telephone: (323) 696-2299

Email: matthew@matthewstrugar.com

Counsel for Plaintiff

^{*} pro hac vice motion forthcoming